

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

JANE DOE, et al.,

Plaintiffs,

v.

No. 3:22-cv-2575

APPLE INC.,

Defendant.

**PLAINTIFFS' MOTION
FOR LEAVE TO FILE UNDER SEAL**

Plaintiffs move for leave to file Exhibit A to Plaintiffs' Motion to Remand and for Sanctions under seal. Defendant has designated material contained therein confidential pursuant to the protective order in the companion case in this Court. *See Doe v. Apple*, No. 3:20-cv-00421-NJR, Doc. 68 ¶12(b).

Plaintiffs do not agree with Defendant's designation, however, Plaintiffs seek leave to file Exhibit A under seal so that Defendant may identify the basis for its position that the document contains material that cannot appear in the public record. *See Goesel v. Boley Int'l (H.K.) Ltd.*, 738 F.3d 831, 833 (7th Cir. 2013) (Documents that affect the disposition of federal litigation are presumptively open to public view). Accordingly, Plaintiffs are contemporaneously filing (1) this motion for leave to file under seal; and (2) Exhibit A under seal.

December 5, 2022

Respectfully submitted,

/s/ Andrew D. Schlichter

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CERTIFICATE OF SERVICE

I hereby certify that on December 5, 2022 I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will automatically send e-mail notification of such filing to the attorneys of record.

/s/ Andrew D. Schlichter